

### **REMARKS**

Applicant would first like to thank Examiner Lan for this examination.

Claims 1-16 are currently pending in the application. Claims 13-16 are objected to as being in improper dependent form. Claims 7-12 stand rejected under 35 USC 101 as claiming non-statutory subject matter. Claims 1-3, 5-6, 7-9, and 11-12 stand rejected under 35 USC 102 as being anticipated by US Pat. No. 6,311,192 to Rosenthal et al (hereafter "Rosenthal"). Claims 4 and 10 stand rejected under 35 USC 103 as being unpatentable over Rosenthal in view of US Pat. Publ. 2002/0091533 to Ims et al.

### **OBJECTION TO CLAIMS**

Claims 13-16 are objected to as being in improper dependent form herein. Claims 13 and 14 are amended to independent form. Claims 15 and 16 are canceled herein.

### **CLAIM REJECTIONS - 35 USC 101**

Claims 7-12 stand rejected under 35 USC 101 as claiming non-statutory subject matter. Specifically, Examiner appears to argue that the computer system in the subject claims can be realized through software and that software is nonstatutory subject matter under 35 USC 101.

The Examiner has provided no authority for the argument that software is nonstatutory, and Applicant is not aware of any per se rule that software is a nonstatutory category of manufacture.

Moreover, claims 7-12 are directed to a computer system. As shown in Fig. 1 and described in the specification, the computer system comprises a processor and a memory. Therefore, Applicant respectfully request that this rejection be withdrawn.

### **CLAIM REJECTIONS - 35 USC 102**

Claims 1-3, 5-6, 7-9, and 11-12 stand rejected under 35 USC 102 as being anticipated by US Pat. No. 6,311,192 to Rosenthal et al (hereafter Rosenthal).

Applicant respectfully contends that claim 1 is allowable because it includes a feature that is neither disclosed nor suggested by Rosenthal or any other reference cited, namely "updating said workflow request with pre-process workflow data." According to certain embodiments of the present invention, prior to workflow processing, pre-processing may be performed such as

substituting workflow data by data from other sources such as data objects held in a data model (see paragraph [0024]). Accordingly, the workflow request is updated to include data from a data model, providing more accurate and/or efficient results.

Rosenthal is directed to a method for initiating workflows in an automated organization management system. In Rosenthal, proposed changes to an organization can be saved without submitting them for implementation, and implementing several saved changes simultaneously. Rosenthal does not disclose or suggest updating a workflow request before processing it.

The Examiner suggests that this feature is disclosed by Rosenthal at Col. 9 lines 21-25 and Col. 8 lines 60-65. Applicant respectfully disagrees. Col. 9 lines 21-25 address the transfer of control to a SUBMIT routine (i.e., calling a SUBMIT routine) to implement a proposed change to a personnel database. Col. 8 lines 60-65 address displaying a name of a person who is proposed to be transferred and querying a user for an action. Rosenthal does not disclose or suggest in either text updating a workflow request, but rather updating a database. Rosenthal also does not disclose or suggest updating the workflow request before processing it.

Claims 2-6 depend from claim 1 and Applicant respectfully contends that they are allowable for the reasons presented above.

Claim 3 is also allowable because it includes another feature that is neither disclosed nor suggested by Rosenthal or any other reference cited, namely “matching logical operations associated with said plurality of request types with corresponding said data objects identified in said data model”. The logical operations within the workflow being requested are enumerated and matched with data objects in the data model before executing the workflow. Rosenthal does not match logical operations within the workflow with data objects from a data model before executing a workflow.

The Examiner suggests that the mode indicator (“SA” or “SH”) of Rosenthal is a logical operation and that Table 1 of Rosenthal matches data objects to logical operations. Applicant respectfully disagrees. The mode indicators of Rosenthal are a status indicator of whether or not a proposed change has been implemented and not a logical operation within a workflow. Moreover, Table 1 of Rosenthal provides different types of workflow which can be carried out by the workflow engine (col. 9 lines 59-60). The table does not match logical operations with corresponding data objects from a data model.

Claim 3 is also allowable because it includes another feature that is neither disclosed nor suggested by Rosenthal or any other reference cited, namely “substituting corresponding said data objects representative of said pre-process workflow data into said workflow request”. The corresponding data objects from the data model are substituted into the workflow request. Rosenthal does not substitute data objects from a data model into a workflow request.

The Examiner suggests that this feature is disclosed by Rosenthal at Col. 9 line 60 – Col.

10 line 11 and at Col. 10 lines 48-55). Applicant respectfully disagrees. The cited text is directed to a scenario table for determining a type of change and which workflow to execute. This is substantially different from substituting corresponding said data objects representative of said pre-process workflow data into said workflow request.

Claim 6 is also allowable because it includes another feature that is neither disclosed nor suggested by Rosenthal or any other reference cited, namely “sending outcome data in notification of said workflow processed from said workflow engine to a post workflow interceptor” and “updating of said data objects in said data model with said outcome data by said post-workflow interceptor to synchronize said data model with said plurality of resources of said computer system”. According to embodiments of the invention, outcome data from the workflow engine is sent to a post-workflow interceptor which synchronizes the data model with the resources. This allows the synchronization to be handled by a post-workflow interceptor rather than the workflow engine, freeing the workflow engine and improving the efficiency of the system. Moreover, this provides for a better data model by updating the data model with the workflow outcomes. Rosenthal does not use a post-workflow interceptor to synchronize a data model with workflow outcome data. Nor does Rosenthal update a data model with workflow outcome.

The Examiner suggests that these features are disclosed by Rosenthal at Col. 10 lines 48-57 and Col. 13 lines 7-23 and Col. 10 line 58 – Col. 11 line 3. Applicant respectfully disagrees. The text of Col. 10 lines 48-57 and the text of Col. 10 line 58 – Col. 11 line 3 are directed to submitting proposed changes which may include changes marked with a “planned” status. The text of Col. 13 lines 7-23 is directed to updating a database, not a data model. Moreover, the database is updated to reflect a proposed change in the database subject to a workflow approval process and not a workflow outcome. These texts do not disclose or suggest using a post-workflow interceptor to synchronize a data model with workflow outcome data or updating a data model with workflow outcome.

Claim 7 is directed to a system for implementing the method of claim 1 and is allowable for the reasons that claim 1 is allowable, provided above.

Claims 8-12 depend from claim 7 and are allowable for the reasons that claim 7 is allowable. Claims 9 and 12 are also allowable for the reasons that claims 3 and 6, respectively are allowable, provided above.

Claims 13 and 14 are directed to a computer program product and signal bearing medium respectively for the method of claim 1 and are allowable for the reasons that claim 1 is allowable, provided above.

**CONCLUSION**

In view of the amendments and arguments presented herein, Applicant respectfully contends that claims 1-14 and 17-18 are in condition for allowance. Accordingly, Applicant respectfully requests entry of the amendments, reconsideration and allowance of claims 1-14 and 17-18 and issuance of letters patent.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven E. Bach", followed by a long horizontal flourish.

Steven E. Bach  
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